

## REMARKS/ARGUMENTS

### **1. Introduction**

This is a full and timely response to the Office action of July 02, 2007. Claims 1 and 11 have been amended. No new material has been introduced. Reconsideration of 5 claims 1-20 is respectfully requested.

### **2. Background**

Claims 1, 2, 4, 5, 7, 9-11, 13, 14, 16, 17, and 19 are rejected under 35 U.S.C. 102(e) as being anticipated by Segawa et al. (US 2002/0057468). Claims 3, 8, 12, 18, and 20 are rejected under 35 U.S.C. 103(a) as being unpatentable over Segawa and further in view of Meek et al. (US 6,741,286). Claims 6 and 16 are rejected under 35 U.S.C. 103(a) as being unpatentable over Segawa.

### **15 3. Response**

Claim 1 has been amended so that the light shield contacts the substrate (paragraph [0030], Fig.9, items 86, 74). Segawa's FCB 8 (Fig.2), suggested by the Examiner as anticipating present item 86 fails to contact the substrate. Segawa's FBC 8 is "sandwiched between the optical glass plate 11 and the photoelectric conversion 20 element 7" (paragraph [0032]) and as seen in Fig.2, fails to meet the present claim 1 structural limitation of contacting the substrate.

Independent claim 11 has also been amended to further define the specific structures found in Fig.9 and Fig.10 of the present application. Claim 11 limitations 25 now include "a fixing device fastened to a bottom side of the substrate" and a cushion installed on the bottom side of the substrate between the fixing device and the bottom side of the substrate. Segawa also fails to meet these structural limitations.

Furthermore, concerning claims 3, 12, and 18, Segawa utilizes the FCB 8 for 30 electrical connections (paragraph [0034]). If, as suggested by the Examiner that

Meek's rubber pad (Fig.1, item 13, lines 33-39) can be used to replace Segawa's FCB 8, the rubber is not able to make the electrical connections. Therefore, the applicant asserts that making the suggested modification is unobvious because an operational principle of the reference device cannot be changed.

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For at least these reasons, the applicant asserts that claims 1-20 of the present application represent a novel and useful device not taught or made obvious in known prior art and respectfully requests reconsideration of all claims.

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Sincerely yours,

Winston Hsu

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20 Note: Please leave a message in my voice mail if you need to talk to me. (The time in D.C. is 12 hours behind the Taiwan time, i.e. 9 AM in D.C. = 9 PM in Taiwan.)